

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

**JANE DOES 1-9,**

**Plaintiffs,**

**vs.**

**COLLINS MURPHY, LIMESTONE  
COLLEGE, MINDGEEK HOLDING  
SARL a/k/a MINDEGEEK USA INC. a/k/a  
MG HOLDINGS USA CORP., d/b/a  
PORNHUB.COM, and HAMMY MEDIA  
LTD. d/b/a XHAMSTER.COM,,**

**Defendants.**

**Case No.: 7:20-cv-00947-TMC**

**MOTION FOR EXTENSION OF TIME  
TO SERVE REMAINING DEFENDANTS**

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the Plaintiff may serve the Summons and Amended Complaint on Defendants MindGeek Holding SARL and Hammy Media Ltd.

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. The current deadline for service is June 16, 2020. At this time, there have been no requests to extend this deadline, nor has the Court granted any extension to this deadline. Plaintiffs respectfully request an additional thirty (30) days to serve the remaining Defendants making the new deadline date July 16, 2020. This extension, if provided, would not interfere with any other deadlines set in this case as a Scheduling Order has not yet been issued. Plaintiffs seek an extension due to the fact that the remaining Defendants are foreign entities not maintained within the continental United States, and service has proven to be

difficult. Plaintiffs anticipate that if service cannot be made within the thirty (30) day extension requested, an Order from the Court allowing for service by publication may be necessary.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

**WHEREFORE**, the Plaintiffs, respectfully request this Court grant Plaintiffs' Motion for Extension of time and enter an order extending the time in which service is due by an additional thirty (30) days.

**WE SO MOVE:**

**BELL LEGAL GROUP, LLC**

s/ J. Edward Bell, III

J. Edward Bell, III (#1280)

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**ATTORNEYS FOR THE  
PLAINTIFFS**